

# **Exhibit 30**

1 UNITED STATES DISTRICT COURT

2 FOR THE WESTERN DISTRICT OF NEW YORK

3 -----  
4 **BLACK LOVE RESISTS IN THE RUST, et al.,**  
5 **individually and on behalf of a class of**  
6 **all others similarly situated,**

7 Plaintiffs,

8 -vs-

1:18-cv-00719-CCR

9 **CITY OF BUFFALO, N.Y., et al.,**

10 Defendants.  
11 -----

12 **ORAL EXAMINATION OF CHARLES SKIPPER**

13 **APPEARING REMOTELY FROM**

14 **ERIE COUNTY, NEW YORK**

15  
16 Friday, March 5, 2021

17 10:05 a.m. - 2:02 p.m.

18 pursuant to notice  
19  
20

21 REPORTED BY:

22 Carrie A. Fisher, Notary Public

23 APPEARING REMOTELY FROM ERIE COUNTY, NEW YORK

DEPAOLO CROSBY REPORTING SERVICES, INC.

135 Delaware Avenue, Suite 301, Buffalo, New York 14202  
716-853-5544

CHARLES SKIPPER - BY MR. CHARNEY - 03/05/21

1 Q. And why did you choose to work those overtime  
2 details?

3 MR. QUINN: Object to form. You can  
4 answer.

5 A. The overtime revenue.

6 Q. The money; is that right?

7 A. I won't lie to you.

8 Q. Okay. I am going to show you another exhibit.

9 This is -- I will scroll to the bottom.  
10 This is marked as Skipper Exhibit 6 and it's  
11 an email from Philip Serafini to who looks  
12 like the Strike Force lieutenants CCing Chief  
13 Young and it's from July 5th, 2016. If you  
14 want to take a moment, Officer Skipper, and  
15 you can read through the email. The subject  
16 of the email is Strike Force Daytime Detail  
17 but if you want to read through it starting  
18 from lieutenants down to the signature block,  
19 just let me know when you're done.

20 MR. QUINN: Do you want him to read it,  
21 Darius?

22 Q. Read it to yourself and then I am going to ask  
23 you a couple questions about it.

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CHARLES SKIPPER - BY MR. CHARNEY - 03/05/21

1 excuse me, Skipper Exhibit 6.

2 So you see here in the second paragraph  
3 it says, "DPC Lockwood wants results with this  
4 increased daytime detail. All officers should  
5 be made aware of this and of what is expected  
6 of them." What do you understand the term  
7 "results" to mean in this context?

8 MR. QUINN: Object to form. You can  
9 answer.

10 A. Justify why I was there. For me, running an  
11 LPR car, I was assuming summonses.

12 Q. Okay. Was -- okay. Was that something that  
13 your Strike Force lieutenants typically  
14 communicated to you, that they wanted you and  
15 your fellow officers to get results when you  
16 worked a Strike Force shift?

17 MR. QUINN: Object to form. You can  
18 answer.

19 A. When I was working, if a lieutenant came in  
20 with eight summonses and I came in with  
21 nothing, I knew at a glance what I had to do,  
22 that I had ten hours of work, that should  
23 produce something.

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CHARLES SKIPPER - BY MR. CHARNEY - 03/05/21

1 Q. Okay.

2 A. That was my -- it didn't have to be written  
3 out. When they said results, I understood  
4 that as either you're making arrests, you're  
5 doing city ordinances, you're doing parking  
6 tickets, or you're writing summonses to  
7 justify my existence.

8 Q. Got it.

9 But that message "you better come back  
10 with results at the end of your shift" was  
11 something that Lieutenant Wilcox and the  
12 other -- your other supervisors communicated  
13 to you?

14 A. Well, they --

15 MR. QUINN: Object to form.

16 A. I am sure they read this to us and we  
17 understood it. I didn't need to have it -- I  
18 understood it as they want results. They  
19 expected me to be doing something.

20 Q. Yeah, I am just trying to understand how you  
21 came to understand that. Was that message  
22 ever communicated to you in any way by your  
23 superiors in the Strike Force?

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CHARLES SKIPPER - BY MR. CHARNEY - 03/05/21

1 the car's registration had been suspended,  
2 right?

3 MR. QUINN: Object to form. You can  
4 answer.

5 A. The reason I would issue that many tickets to  
6 city court was to impress upon them that his  
7 license is suspended, it could be for numerous  
8 violations, more than a certain number of  
9 violations, could be for the insurance. His  
10 registration is suspended for no insurance.  
11 He had a lot going on.

12 Q. Okay. So when you say you wanted to impress  
13 upon them, you wanted to communicate to city  
14 court that this person had some serious issues  
15 with their vehicle?

16 MR. QUINN: Object to form. You can  
17 answer.

18 A. Absolutely.

19 Q. Okay. Were there any other reasons why you  
20 would write multiple tickets -- in your  
21 experience write multiple tickets for the same  
22 conduct?

23 MR. QUINN: Object to form.

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CHARLES SKIPPER - BY MR. CHARNEY - 03/05/21

1 A. No. I mean, you can refer back to writing a  
2 tint, you could write all four or write one.  
3 It would be your discretion.

4 Q. Okay. Well, that's actually a good segue to  
5 my next exhibit which this is going to be  
6 Exhibit 16 I believe, Skipper 16, and this is  
7 a similar chart where we pulled from the TraCS  
8 data the tickets you wrote at the other  
9 location we looked at earlier, the  
10 Leslie/Scajaquada location, and I wanted to  
11 look here I am going to scroll down. This is  
12 a five-page document.

13 Here so let's look at the bottom here --  
14 I am sorry, at the top I want to go over where  
15 you see Driver 12145 and it looks like 12145  
16 was issued -- it looks like you issued them  
17 ten tickets on November 10th, 2016, at the  
18 Leslie/Scajaquada location and it looks like  
19 here you wrote four tickets for what I think  
20 are illegally tinted windows; is that correct?

21 A. Yes.

22 Q. So here would it -- again, you're issuing four  
23 tickets for what is essentially the same

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1 STATE OF NEW YORK)

2 COUNTY OF ERIE )

3  
4 I, Carrie A. Fisher, Notary Public, in and  
5 for the County of Erie, State of New York, do  
6 hereby certify:

7 That the witness whose testimony appears  
8 hereinbefore was, before the commencement of  
9 their testimony, duly sworn to testify the  
10 truth, the whole truth and nothing but the  
11 truth; that said testimony was taken remotely  
12 pursuant to notice at the time and place as  
13 herein set forth; that said testimony was  
14 taken down by me and thereafter transcribed  
15 into typewriting, and I hereby certify the  
16 foregoing testimony is a full, true and  
17 correct transcription of my shorthand notes so  
18 taken.

19 I further certify that I am neither counsel  
20 for nor related to any party to said action,  
21 nor in anyway interested in the outcome  
22 thereof.

23 IN WITNESS WHEREOF, I have hereunto  
subscribed my name and affixed my seal this  
26th day of March, 2021.

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Carrie A. Fisher  
Notary Public - State of New York  
No. 01FI6240227  
Qualified in Erie County  
My commission expires 5/02/23

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